

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

MEMO ENDORSED

By ECF

The Honorable Edgardo Ramos United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

November 14, 2023

Trial is adjourned to February 12, 2024 at 9:30 a.m. Pretrial documents are due January 12, 2024. Responses thereto are due January 26, 2024. A final pretrial conference will be held on February 1, 2024 at 2:30 p.m. Speedy trial time is excluded from December 11, 2023, until February 12, 2024, in the interest of justice. SO ORDERED.

> Edgardo Ramos, U.S.D.J. Dated: 11/16/2023

United States v. Thomas Santos, et al., S1 20 Cr. 481 (ER) New York, New York

Re:

Dear Judge Ramos:

With the consent of all parties, the Government writes respectfully regarding the upcoming trial and associated pretrial deadlines in this case. Trial is currently scheduled to begin on December 11, 2023, and the parties are required to submit pretrial filings on or before November 20, 2023. (See Doc. No. 207.)

Counsel for Erik Suarez is currently conducting another trial, and may have another matter in early December 2023. Similarly, counsel for Adrean Coombs is preparing to try two homicide cases—both approximately three years old—which will commence in January 2024 after long delays. Additionally, the Government is currently engaged in discussions with counsel for Mr. Coombs regarding a potential pretrial resolution of his case.

Accordingly, the Government respectfully requests that trial in this matter, along with all associated pretrial filing deadlines, be adjourned for a period of sixty days. Counsel for the defendants have consented to an adjournment and exclusion of time under the Speedy Trial Act.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney Southern District of New York

/s/ Jarrod L. Schaeffer By:

> Jarrod L. Schaeffer / Elizabeth A. Espinosa Assistant United States Attorneys Tel: (212) 637-2270 / 2216

cc: Counsel of Record (via ECF)